

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

MICHAEL J. DANIELS and BARBARA )  
HIGH-DANIELS, individually and as next )  
Friend of XAVIER DANIELS and )  
SEBASTIAN DANIELS, et al., )

Plaintiffs )

v. )

AETC II PRIVATIZED HOUSING, LLC; )  
AETC II PROPERTY MANAGERS, LLC; )  
and HUNT ELP, Ltd. d/b/a HUNT )  
MILITARY COMMUNITIES, )

Defendants. )

Case No. 5:19-cv-01280

**DECLARATION OF CHRIS RADLIFF**

I, Chris Radliff, declare in accordance with 28 U.S.C. § 1746 that the following is true and correct:

1. My name is Chris Radliff, and I am the Vice President of Operations for Hunt Military Communities, with responsibility over the operation of thirteen (13) military housing communities with 8900 housing units and 225 employees, including the military housing communities at Randolph AFB and Laughlin AFB.

2. I make the following Declaration from my own personal knowledge.

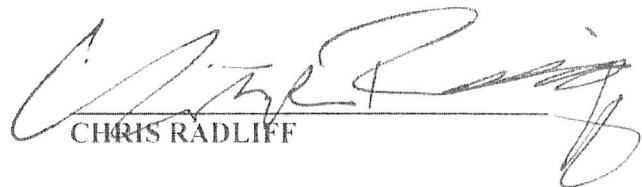
3. I have reviewed and considered Plaintiffs' request for an AETC Housing witness to testify about "maintenance and other known issues" at all of the houses at Randolph and Laughlin since 2007.

4. I requested that HR personnel research how many current and former employees were employed in positions at either Randolph Family Housing or Laughlin Family Housing who

would likely have information about "maintenance or other known issues" at any home at Randolph or Laughlin. The applicable records on our current HR system are from 2015 forward.

5. From 2015 forward, the number of current or former employees who held positions which would have information about "maintenance or other known issues" at houses at those bases was sixty (60) at Randolph Family Housing and ninety-seven (97) at Laughlin Family Housing.

My name is Chris Radliff, and my business address is 601 North Mesa Suite 1900 | El Paso, TX | 79901. I declare under penalty of perjury that the foregoing is true and correct. Executed in Okaloosa County, Florida on May 23, 2020.



CHRIS RADLIFF